

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

SUPERSEDING  
INDICTMENT

- v. -

S12 10 Cr. 905 (LTS)

MANUEL GEOVANNY RODRIGUEZ-PEREZ,

a/k/a "Manny,"

a/k/a "Shorty,"

a/k/a "Andres Garcia,"

JOSE BETANCOURT,

KAREEM BURKE,

a/k/a "Biggs,"

JENNY CASTILLO,

MIGUEL CERDA,

a/k/a "Manganzon,"

ROSEMARY DEJESUS,

a/k/a "Rosy,"

WILLIAM ALCIBIO DELGADO,

a/k/a "Mejor,"

EDGAR ENCARNACION-LAFONTAINE,

a/k/a "Tapon,"

JAVIER FALCON,

DANIEL FERNANDEZ,

ALFONSO GARCIA,

a/k/a "Fonse,"

a/k/a "Fonz,"

KLEVI GUTIERREZ,

a/k/a "Black,"

EDWING ALBERTO HERRERA,

a/k/a "Edwin Alberto Herrera,"

a/k/a "Shampoo,"

ISIDRO ESMELIN HERRERA,

ESTALIN JIMENEZ,

a/k/a "Stalin,"

a/k/a "Moyi,"

RICARDO JIMENEZ-PADILLA,

a/k/a "Gordo,"

RICHARD JIMENEZ-PEREZ,

a/k/a "Milton Delgado,"

a/k/a "Javier Ramirez-Santiago,"

JULIO CESAR LEONARDO RAMIREZ,

FRANCISCO LEONARDO,

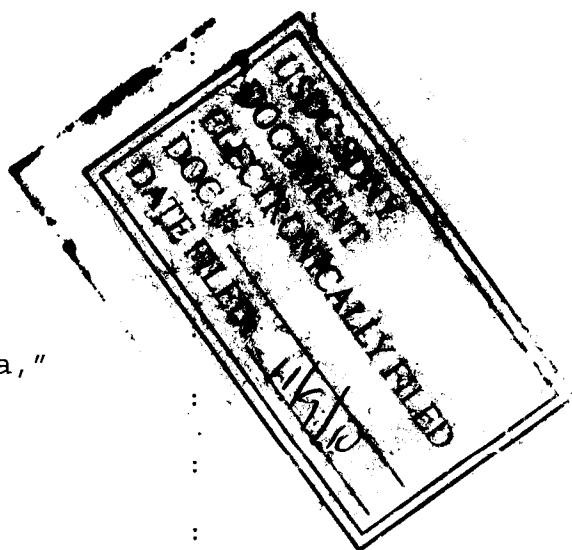
a/k/a "Chico,"

ANDY LOCIER,

JIMMY LOPEZ,

a/k/a "Chuck,"

LUIS ANTONIO LUCIANO,



a/k/a "Louis Luciano," :  
 a/k/a "Lucky," :  
 MICHAEL MARTINEZ, :  
 a/k/a "Miguel Doleo," :  
 ROBERT MARTINEZ, :  
 ABEL MATOS, :  
 a/k/a "Viejo," :  
 NELSON AUGUSTO MATOS, :  
 IDAEL MENA-HERNANDEZ, :  
 a/k/a "Fidel," :  
 ARTURO MENA-SIFONTE, :  
 a/k/a "La Vieja," :  
 ERICK FULGENCIO NUNEZ, :  
 a/k/a "Mongolico," :  
 a/k/a "Eddie," :  
 FRANKLIN MANUEL PACHECO-VALDEZ, :  
 DEYANIRA PAULINO-GOMEZ, :  
 a/k/a "Maritza Alvarez-Cruz," :  
 ARIEL PENA, :  
 a/k/a "Bin," :  
 a/k/a "Vin," :  
 JOSE RAMON PEREZ, :  
 LEODIS PEREZ, :  
 a/k/a "Leodi," :  
 MIRIAM PIMENTEL, :  
 RICARDO PIMENTEL, :  
 a/k/a "Richardo Pimentel," :  
 a/k/a "Zook," :  
 a/k/a "Scarface," :  
 VICTOR QUEZADA, :  
 a/k/a "Jose Hiram Quintero-Callejas," :  
 a/k/a "Gordo," :  
 EMMANUEL RAMIREZ, :  
 a/k/a "Titi," :  
 LETICIA RAPOSO, :  
 a/k/a "La Rubia," :  
 MICHAEL ANGELO REYES, :  
 a/k/a "Kiki," :  
 EDWIN RIVERA, :  
 a/k/a "Papote," :  
 JOSE A. RODRIGUEZ, :  
 a/k/a "Viejo," :  
 OSCAR RODRIGUEZ, :  
 a/k/a "Chang," :  
 a/k/a "Chan," :  
 ANDRES ROJAS, :  
 a/k/a "Conejo," :  
 JESUS SANCHEZ, :

ADEL SANTANA-ZAMORA,	:
a/k/a "Adel Santana,"	:
MATTHEW SANTIAGO,	:
a/k/a "Dirt,"	:
MATTHEW WOODSTOCK STANG,	:
a/k/a "Magazine Guy,"	:
JEROME SIMPSON,	:
a/k/a "Suburban,"	:
DANIEL VALDEZ,	:
OSMEL VAZQUEZ-PEREZ,	:
a/k/a "Come Pizza,"	:
a/k/a "Omel,"	:
CHRISTOPHER VIZCAINO,	:
a/k/a "Christopher Viscaino,"	:
a/k/a "Chuch,"	:
a/k/a "Pechucho,"	:
a/k/a "Pechuch,"	:
Defendants.	:

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COUNT ONE:  
Organization Marijuana Conspiracy

The Grand Jury charges:

1. From at least in or about 1992, up to and including in or about October 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," JENNY CASTILLO, MIGUEL CERDA, a/k/a "Manganzon," ROSEMARY DEJESUS, a/k/a "Rosy," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," ANDY LOCIER, JIMMY LOPEZ,

a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, ARIEL PENA, a/k/a "Bin," a/k/a "Vin," JOSE RAMON PEREZ, LEODIS PEREZ a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," EMMANUEL RAMIREZ, a/k/a "Titi," LETICIA RAPOSO, a/k/a "La Rubia," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA, a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a "Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," and CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," JENNY CASTILLO, MIGUEL CERDA, a/k/a "Manganzon," ROSEMARY DEJESUS, a/k/a "Rosy," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," ANDY LOCIER, JIMMY LOPEZ, a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, ARIEL PENA, a/k/a "Bin," a/k/a "Vin," JOSE RAMON PEREZ, LEODIS PEREZ a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," EMMANUEL RAMIREZ, a/k/a "Titi," LETICIA RAPOSO, a/k/a "La Rubia," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA, a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a

"Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," and CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

OVERT ACTS

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about August 8, 2008, ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," the defendant, was driving a car in Brooklyn, New York, that contained approximately eight pounds of marijuana and approximately \$5,000 in U.S. currency.

b. On or about February 26, 2009, RICHARD JIMENEZ-PEREZ, a/k/a "Milton Delgado," a/k/a "Javier

Ramirez-Santiago," the defendant, was driving a vehicle in the vicinity of Englewood, New Jersey, that contained approximately \$458,875.90 in its trunk.

c. On or about May 8, 2009, DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendant, possessed approximately \$74,705 hidden inside tube socks that were concealed in the lining of her checked luggage at John F. Kennedy International Airport, Queens, New York ("JFK Airport"), which was subsequently seized (the "May 2009 Money Seizure").

d. On or about June 26, 2009, JULIO CESAR LEONARDO RAMIREZ, the defendant, possessed approximately \$100,000 hidden inside tube socks that were concealed in his checked luggage at LaGuardia Airport, Queens, New York ("LGA Airport"), which was subsequently seized (the "June 2009 Money Seizure").

e. On or about June 26, 2009, JULIO CESAR LEONARDO RAMIREZ, the defendant, discussed via telephone with WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," the defendant, the June 2009 Money Seizure.

f. On or about June 27, 2009, WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," the defendant, discussed via telephone with DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendant, whether a claim could be made for the money from the June 2009 Money Seizure.

g. On or about August 24, 2009 at Miami International Airport, Miami, Florida, ESTALIN JIMENEZ, a/k/a "Stalin," a/k/a "Moyi," the defendant, who was at the airport with JOSE RAMON PEREZ, the defendant, possessed approximately \$393,945 in JIMENEZ's suitcase, which was seized (the "August 2009 Money Seizure").

h. On or about August 26, 2009, ROSEMARY DEJESUS, a/k/a "Rosy," the defendant, discussed via telephone with DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendant, making fraudulent claims for the funds from the May 2009 Money Seizure and from the August 2009 Money Seizure.

i. On or about August 26, 2009, FRANKLIN MANUEL PACHECO-VALDEZ, the defendant, placed a telephone call to WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," the defendant, to ask when DELGADO would have marijuana available to sell to him.

j. On or about August 27, 2009, ADEL SANTANA, a/k/a "Adel Santana-Zamora," the defendant, possessed approximately 87.6 pounds of marijuana in a tractor trailer in Brooklyn, New York, which was seized.

k. On or about October 22, 2009, a stash house located on Pinehurst Avenue, New York, New York that ARIEL PENA, a/k/a "Bin," a/k/a "Vin," the defendant, and Kenneth Pena, a coconspirator not named in this Indictment, were believed to control (the "Pinehurst Stash Location"), contained approximately



\$76,672 in marijuana proceeds, some of which was, inter alia, grouped in rubber bands on a table; approximately 22 pounds of marijuana inside a closet; and paperwork reflecting marijuana obtained and sold, the proceeds from the same, and the payment of workers.

l. From in or about July 2009 up to and including on or about October 22, 2009, ARIEL PENA, a/k/a "Bin," a/k/a "Vin," WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," RICHARD JIMENEZ-PEREZ, a/k/a "Milton Delgado," a/k/a "Javier Ramirez-Santiago," the defendants, and others known and unknown, entered and exited the Pinehurst Stash Location.

m. On or about October 9, 2009, ANDRES ROJAS, a/k/a "Conejo," the defendant, placed a telephone call to JOSE RAMON PEREZ, the defendant, to discuss purchasing marijuana from PEREZ.

n. On or about November 11, 2009, JOSE RAMON PEREZ, the defendant, possessed approximately 40 pounds of marijuana in a vehicle he was driving in the vicinity of Miami-Dade, Florida, which was seized.

o. On or about November 13, 2009, EMMANUEL RAMIREZ, a/k/a "Titi," the defendant, placed a telephone call to Kenneth Pena, a coconspirator not named in this Indictment, who advised RAMIREZ that ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz,"

and KLEVI GUTIERREZ, a/k/a "Black," the defendants, had counted a quantity of marijuana.

p. On or about November 19, 2009, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," the defendant, placed a telephone call to OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," the defendant, to discuss the transportation of narcotics.

q. On or about November 30, 2009, KLEVI GUTIERREZ, a/k/a "Black," the defendant, placed a telephone call to Kenneth Pena, a coconspirator not named in this Indictment, to tell him that he had drug proceeds and marijuana.

r. On or about December 4, 2009, JENNY CASTILLO, the defendant, placed a telephone call to Kenneth Pena, a coconspirator not named in this Indictment, in which they discussed the manner in which CASTILLO had prepared marijuana for retail sale.

s. On or about December 4, 2009, CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendant, placed a telephone call to Kenneth Pena, a coconspirator not named in this Indictment, to discuss how much he was getting paid for selling marijuana.

t. On or about January 23, 2010, MICHAEL MARTINEZ, a/k/a "Miguel Doleo," and MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres

Garcia," the defendants, discussed via telephone RODRIGUEZ bringing marijuana to sell to a customer at MARTINEZ's place of work.

u. On or about February 8, 2010, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," the defendant, possessed approximately 765 grams of marijuana, which was packaged for retail sale, in his vehicle in the vicinity of Newark, New Jersey, which marijuana was seized.

v. On or about February 27, 2010, NELSON AUGUSTO MATOS, the defendant, received a telephone call from MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, in which RODRIGUEZ requested that MATOS pay for marijuana that had been provided to MATOS.

w. On or about March 14, 2010, DANIEL VALDEZ, the defendant, placed a telephone call to MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, and discussed what kind of marijuana RODRIGUEZ had available to sell.

x. On or about March 16, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, placed a telephone call to JEROME SIMPSON, a/k/a "Suburban," the defendant, during which SIMPSON requested to buy marijuana from RODRIGUEZ.

y. On or about March 26, 2010, DANIEL FERNANDEZ, the defendant, placed a telephone call to MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, who was then in New York, New York, to discuss payment for a shipment of marijuana from Florida.

z. Also on or about March 26, 2010, in New York, New York, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, placed a telephone call to JOSE BETANCOURT, the defendant, to discuss said payment.

aa. On or about April 2, 2010, MIGUEL CERDA, a/k/a "Manganzon," the defendant, participated in a telephone call with MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, who was then in New York, New York, to discuss a shipment of narcotics from Florida.

bb. On or about April 19, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, in New York, New York, placed a telephone call to JESUS SANCHEZ, the defendant, to discuss a shipment of marijuana from Florida to New York.

cc. On or about May 17, 2010, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," the defendant, possessed

approximately \$212,549.00 in narcotics proceeds, which were seized (the "May 2010 Money Seizure").

dd. On or about May 18, 2010, JOSE BETANCOURT, the defendant, placed a telephone call to MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, who was then in New York, New York, in which they discussed the May 2010 Money Seizure.

ee. On or about May 24, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," and LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," the defendants, discussed via telephone how LUCIANO would be able to continue trafficking in marijuana while on house arrest.

ff. On or about May 29, 2010, RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," and MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendants, discussed via telephone operating a marijuana "grow house" in the New York, New York area.

gg. On or about June 8, 2010, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," MIRIAM PIMENTEL, and FRANCISCO LEONARDO, a/k/a "Chico," the defendants, discussed via telephone the amount of marijuana and marijuana proceeds at the residence of MIRIAM PIMENTEL, in New York, New York.

hh. On or about June 9, 2010, JIMMY LOPEZ, a/k/a "Chuck," the defendant, met with MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, in a "stash house" where they stored marijuana, which was located in the vicinity of Flushing, New York.

ii. On or about June 11, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, placed a telephone call to OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," the defendant, in which they compared the prices they were paying for marijuana from the same supplier.

jj. On or about June 26, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," and EDGAR ENCARNACION, a/k/a "Tapon," the defendants, discussed via telephone whether ENCARNACION, who was a driver for FedEx, could transport marijuana for RODRIGUEZ.

kk. On or about June 30, 2010, JAVIER FALCON, the defendant, traveled by truck to a rest stop in Ardsley, New York.

ll. on or about July 3, 2010, ROBERT MARTINEZ, the defendant, attempted to transport approximately \$100,000 in narcotics proceeds for MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, via a flight from JFK Airport to Los Angeles International Airport, Los Angeles, California ("LAX Airport").

mm. On or about July 8, 2010, ARTURO MENA-SIFONTE, a/k/a "La Vieja," the defendant, met with JOSE A. RODRIGUEZ, a/k/a "Viejo," the defendant, in New York, New York.

nn. On or about July 25, 2009, LETICIA RAPOSO, a/k/a "La Rubia," the defendant, received a telephone call from WILLIAM DELGADO, a/k/a "Mejor," the defendant, during which they discussed, in code, RAPOSO obtaining narcotics proceeds.

oo. On or about August 21, 2010, LEODIS PEREZ, a/k/a "Leodi," the defendant, discussed via telephone with MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, PEREZ buying marijuana from RODRIGUEZ, and that MICHAEL ANGELO REYES, a/k/a "Kiki," the defendant, would provide the marijuana to PEREZ.

pp. On or about September 5, 2010, JOSE RAMON PEREZ, the defendant, controlled an apartment in Queens, New York, where approximately 140 pounds of marijuana were located.

qq. On or about September 9, 2010, EDWIN RIVERA, a/k/a "Papote," and MICHAEL REYES, a/k/a "Kiki," the defendants, met so RIVERA could pay for marijuana he previously purchased.

rr. On or about October 1, 2010, EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," the defendant, had telephone conversations with MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, to tell RODRIGUEZ, in code, that HERRERA

was going to deliver money to a residence located in Miami, Florida, that was controlled by JESUS SANCHEZ, the defendant; HERRERA then delivered money to that residence.

ss. Also on or about October 1, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, directed MICHAEL REYES, a/k/a "Kiki," the defendant, to deliver money to ISIDRO ESMELIN HERRERA, the defendant; RODRIGUEZ then placed a telephone call to HERRERA to confirm that HERRERA had received the appropriate amount of money.

tt. On or about October 9, 2010, VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," the defendant, possessed approximately \$47,998 at LGA Airport, which was seized.

uu. On or about October 15, 2010, KAREEM BURKE, a/k/a "Biggs," the defendant, possessed approximately \$15,000 and 3.2 pounds of marijuana, and maintained a marijuana "grow house" at his residence in the vicinity of North Bergen, New Jersey.

vv. On or about October 15, 2010, ISIDRO ESMELIN HERRERA, the defendant, possessed approximately \$837,311 and 14 pounds of marijuana at his residence in the Bronx, New York.

ww. On or about October 15, 2010, ANDY LOCIER, the defendant, possessed approximately 23 pounds of marijuana at his residence in the Bronx, New York.



xx. On or about October 15, 2010, ABEL MATOS, a/k/a "Viejo," the defendant, possessed approximately \$9,500 at his residence in Edgewater, New Jersey.

yy. On or about October 15, 2010, MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," and FRANCISCO LEONARDO, a/k/a "Chico," the defendants, possessed approximately \$63,199 and 13 pounds of marijuana at the residence where MIRIAM PIMENTEL and LEONARDO were living in New York, New York.

zz. On or about October 15, 2010, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," the defendant, possessed approximately \$105,156 at a "stash house" located in New York, New York.

aaa. On or about October 15, 2010, ANDRES ROJAS, a/k/a "Conejo," the defendant, possessed approximately \$20,070 at his residence in New York, New York.

bbb. On or about October 15, 2010, MATTHEW SANTIAGO, a/k/a "Dirt," the defendant, possessed approximately 251 grams of marijuana and a Ruger 9 millimeter pistol, which was loaded, at his residence in New York, New York.

ccc. On or about October 15, 2010, MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," the defendant, possessed approximately 25 pounds of marijuana, one pound of hashish,

\$167,667, and 15,280 Euros, at his residence in New York, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO:

RODRIGUEZ Cell Marijuana Conspiracy

The Grand Jury further charges:

5. From at least in or about 1992, up to and including in or about October 2010, in the Southern District of New York and elsewhere, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," MIGUEL CERDA, a/k/a "Manganzon," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," FRANCISCO LEONARDO, a/k/a "Chico," ANDY LOCIER, JIMMY LOPEZ, a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," LEODIS PEREZ, a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA, a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES

ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a "Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, and OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," MIGUEL CERDA, a/k/a "Manganzon," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," FRANCISCO LEONARDO, a/k/a "Chico," ANDY LOCIER, JIMMY LOPEZ, a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," LEODIS PEREZ, a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA,

a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a "Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, and OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

7. The controlled substance involved in the offense was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT THREE:

PENA Cell Marijuana Conspiracy

The Grand Jury further charges:

8. From at least in or about 2006, up to and including in or about October 2010, in the Southern District of New York and elsewhere, JENNY CASTILLO, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," ARIEL PENA, a/k/a "Bin," a/k/a "Vin," EMMANUEL RAMIREZ, a/k/a "Titi," and CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendants, and

others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

9. It was a part and an object of the conspiracy that JENNY CASTILLO, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," ARIEL PENA, a/k/a "Bin," a/k/a "Vin," EMMANUEL RAMIREZ, a/k/a "Titi," and CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

10. The controlled substance involved in the offense was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT FOUR:

JIMENEZ-PEREZ/DELGADO Cell Marijuana Conspiracy

The Grand Jury further charges:

11. From at least in or about February 2009, up to and including in or about October 2010, in the Southern District of New York and elsewhere, ROSEMARY DEJESUS, a/k/a "Rosy," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, JOSE RAMON PEREZ, LETICIA RAPOSO, a/k/a

"La Rubia," ANDRES ROJAS, a/k/a "Conejo," ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," and OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

12. It was a part and an object of the conspiracy that ROSEMARY DEJESUS, a/k/a "Rosy," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, JOSE RAMON PEREZ, LETICIA RAPOSO, a/k/a "La Rubia," ANDRES ROJAS, a/k/a "Conejo," ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," and OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

13. The controlled substance involved in the offense was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT FIVE:

JIMENEZ-PEREZ/DELGADO Cell Money Laundering Conspiracy

The Grand Jury further charges:

14. From at least in or about 2008, up to and including in or about October 2010, in the Southern District of New York and elsewhere, WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," ESTALIN JIMENEZ, a/k/a "Stalin," a/k/a "Moyi," RICHARD JIMENEZ-PEREZ, a/k/a "Milton Delgado," a/k/a "Javier Ramirez-Santiago," JULIO CESAR LEONARDO RAMIREZ, and DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(A)(i).

15. It was a part and an object of the conspiracy that WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," ESTALIN JIMENEZ, a/k/a "Stalin," a/k/a "Moyi," RICHARD JIMENEZ-PEREZ, a/k/a "Milton Delgado," a/k/a "Javier Ramirez-Santiago," JULIO CESAR LEONARDO RAMIREZ, and DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash transferred in numerous transactions, unlawfully, willfully and knowingly, would and did conduct and attempt to conduct such financial transactions which in fact

involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT SIX:

DANIEL VALDEZ's Commission Of Crimes While Released On Bail

The Grand Jury further charges:

16. From at least in or about October 2008, up to and including at least in or about July 2010, in the Southern District of New York and elsewhere, DANIEL VALDEZ, the defendant, committed the offenses charged in Counts One and Two while released on bail, pursuant to Title 18, United States Code, Section 3142, in connection with criminal charges pending against him in United States v. Anyelo Mejia, et al., case numbered 08 Mag. 954 (EDNY) and 08 Cr. 828 (Vitaliano, J., EDNY).

17. Accordingly, DANIEL VALDEZ, the defendant, is subject to the enhanced penalties of Title 18, United States Code, Section 3147.

(Title 18, United States Code, Section 3147(1).)

COUNT SEVEN:

MATTHEW SANTIAGO's Possession Of A Firearm During And In Relation To A Drug Trafficking Crime

The Grand Jury further charges:

18. In or about October 2010, in the Southern District of New York and elsewhere, MATTHEW SANTIAGO, a/k/a "Dirt," the



defendant, unlawfully, willfully and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offenses charged in Counts One and Two of this Indictment, did use and carry a firearm, and in furtherance of such crimes did possess a firearm, to wit, a loaded 9 millimeter Ruger pistol.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT EIGHT:

CHRISTOPHER VIZCAINO And ALFONSO GARCIA's Marijuana Conspiracy

The Grand Jury further charges:

19. In or about November 2010, in the Southern District of New York and elsewhere, CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," and ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

20. It was a part and an object of the conspiracy that CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," and ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21. The controlled substance involved in the offense was mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT NINE:

CHRISTOPHER VIZCAINO's Commission Of Crimes While Released On Bail

The Grand Jury further charges:

22. In or about November 2010, in the Southern District of New York and elsewhere, CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendant, committed the offense charged in Count Eight while released on bail, pursuant to Title 18, United States Code, Section 3142, in connection with criminal charges pending against him in United States v. Kareem Burke, et al., case numbered 10 Mag. 2253 (SDNY).

23. Accordingly, CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendant, is subject to the enhanced penalties of Title 18, United States Code, Section 3147.

(Title 18, United States Code, Section 3147(1).)

COUNT TEN:

ALFONSO GARCIA's Commission Of Crimes While Released On Bail

The Grand Jury further charges:

24. In or about November 2010, in the Southern District of New York and elsewhere, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," the defendant, committed the offense charged in Count Eight while released on bail, pursuant to Title 18, United States Code, Section 3142, in connection with criminal charges pending against him in United States v. Kareem Burke, et al., case numbered 10 Mag. 2253 (SDNY).

25. Accordingly, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," the defendant, is subject to the enhanced penalties of Title 18, United States Code, Section 3147.

(Title 18, United States Code, Section 3147(1).)

FORFEITURE ALLEGATION:

Counts One Through Four and Eight: Narcotics Conspiracies

26. As a result of committing the controlled substance offenses alleged in Counts One through Four and Eight of this Indictment, MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," JENNY CASTILLO, MIGUEL CERDA, a/k/a "Manganzon," ROSEMARY DEJESUS, a/k/a "Rosy," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, RICARDO JIMENEZ-PADILLA, a/k/a

"Gordo," ANDY LOCIER, JIMMY LOPEZ, a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, ARIEL PENA, a/k/a "Bin," a/k/a "Vin," JOSE RAMON PEREZ, LEODIS PEREZ a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," EMMANUEL RAMIREZ, a/k/a "Titi," LETICIA RAPOSO, a/k/a "La Rubia," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA, a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a "Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omel," and CHRISTOPHER VIZCAINO, a/k/a "Christopher Viscaino," a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of the offenses and any and all property used and intended to be used in

any manner and part to commit and to facilitate the commission of the controlled substances offenses alleged in Counts One through Four and Eight of this Indictment, including, but not limited to, the following:

a. a sum of at least \$50 million in United States currency, representing the amount of all proceeds obtained as a result of the controlled substance offense alleged in Count One through Four of the Indictment;

b. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 62 East 131 Street, New York, New York, 10037;

c. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5051-5055 Broadway, New York, New York, 10034;

d. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1830 South Ocean Drive, #2302 Hallandale Beach, Florida, 33009;

e. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1830 South Ocean Drive, #3005 Hallandale Beach, Florida 33009;

f. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 8100 Geneva Court, Apartment 239, Doral, Florida 33166;

g. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1306 Calder Road, Key Largo, Florida 33037;

h. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 63 East 9th Street, Unit 40, New York, New York 10003, including any and all right, title, and interest in shares in Randall House Owners Corp. and any proprietary lease;

i. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 26 Bergen Ridge Road, North Bergen, New Jersey 07047;

j. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 220 Northwest 129th Avenue, Miami, Florida 33182;

k. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments

and easements, located at 939 Southwest 155th Court, Miami, Florida 33185;

l. approximately \$25,000 in United States currency seized on or about December 3, 2009, from MANUEL RODRIGUEZ in New York, New York;

m. approximately \$105,156 in United States currency seized on or about October 15, 2010, from 5400 Fieldston Road, Apartment 31E, Bronx, New York 10471;

n. approximately \$12,000 in United States currency seized on or about October 15, 2010, from 3206 Fairfield Avenue, Apartment 3B, Bronx, New York 10463;

o. approximately \$2,404 in United States currency, 6 pieces of jewelry, a monogrammed Louis Vuitton shoulder bag, and 3 rifles seized on or about October 15, 2010, from MANUEL GEOVANNY RODRIGUEZ-PEREZ at 3 Brookridge Road, Unit 3, New Rochelle, New York 10804;

p. approximately \$60,001 in United States currency and ten pieces of gold jewelry seized on or about October 21, 2010, from safe deposit box number 90061-100-1941, registered to Belkis Rodriguez and Maria Rodriguez, at Banco Popular, 2852 Broadway, New York, New York 11207;

q. approximately \$54,790 in United States currency and twenty pieces of gold jewelry seized on or about October 21, 2010, from safe deposit box number 90061-100-1963,

registered to Estela D. Rodriguez and Maria Rodriguez, at Banco Popular, 2852 Broadway, New York, New York 11207;

r. approximately \$837,311 in United States currency seized on or about October 15, 2010, from 7 Fordham Hill Oval, Apartment 1B, Bronx New York 10468;

s. approximately \$167,667 in United States currency and approximately €15,280 seized on or about October 15, 2010, from 63 East 9th Street, Unit 40, New York, New York 10003;

t. two Series EE United States Savings Bonds, CUSIP numbers X3930005EE and X3930004EE, seized on or about October 18, 2010, safe deposit box number 1052, registered to Matthew Stang and Betsy Stang, at JPMorgan Chase Bank, 26 Astor Place, New York, New York 10003;

u. approximately \$89,800 in United States currency seized on or about October 15, 2010, from 505 West 37th Street, Apartment 8I, New York, New York 10018;

v. approximately \$63,199 in United States currency seized on or about October 15, 2010, from 4530 Broadway, Apartment 5C, New York, New York 11103;

w. approximately \$47,998 in United States currency seized on or about October 9, 2010, from VICTOR QUEZADA at LGA Airport;



x. approximately \$41,191 in United States currency seized on or about October 15, 2010, from 455 West 37th Street, Apartment 405, New York, New York 10018;

y. approximately \$20,070 in United States currency seized on or about October 15, 2010, from 1885 Amsterdam Avenue, Apartment 5B, New York, New York 10032;

z. approximately \$15,000 in United States currency seized on or about October 15, 2010, from 26 Bergen Ridge Road, North Bergen, New Jersey 07047;

aa. approximately \$9,500 in United States currency seized on or about October 15, 2010, from 100 Grand Cove, Apartment 3F, Edgewater, New Jersey 07020;

bb. approximately \$5,491.25 in United States currency seized on or about October 14, 2010, from RICARDO PIMENTEL, in East Orange, New Jersey;

cc. approximately \$3,073 in United States currency seized on or about October 15, 2010, from 25 Post Avenue, Apartment 3C, New York, New York 10034;

dd. jewelry seized on or about October 15, 2010, from 173-19 47th Avenue, Flushing, New York 13358;

ee. approximately 14 pieces of jewelry seized on or about October 15, 2010, from Giselle Gutierrez, in New York, New York;

ff. approximately \$996,600 in United States currency and a quantity of Dominican currency seized on or about October 21, 2010, from safe deposit box number 499, registered to Ricardo Pimentel and Miriam M. Pimentel, at Apple Bank, 4251 Broadway, New York, New York 11103;

gg. approximately \$614,750 in United States currency seized on or about October 21, 2010, from safe deposit box # 187, registered to Ricardo Pimentel and Miriam M. Pimentel, at Apple Bank, 4950 Broadway, New York, New York 10034;

hh. approximately \$70,850 in United States currency seized on or about October 21, 2010, from safe deposit box # 361, registered to Miriam M. Pimentel and Leonardo Socrates, at Apple Bank, 4950 Broadway, New York, New York 10034;

ii. approximately \$298,109 in United States currency seized on or about October 15, 2010, from 220 Northwest 129th Avenue, Miami, Florida 33182;

jj. approximately \$10,000 in United States currency and two pieces of jewelry seized on or about October 26, 2010, from safe deposit box number 277, registered to Maira Sanchez and Alexander Sanchez, at JPMorgan Chase Bank, International Mall Branch, 10495 Northwest 12th Street, Miami, Florida 33172;

kk. approximately 16 pieces of jewelry seized on or about October 26, 2010, from safe deposit box number 210,

registered in the names Maira Sanchez and Jesus Sanchez, at JPMorgan Chase Bank, International Mall Branch, 10495 Northwest 12th Street, Miami, Florida 33172;

ll. approximately \$16,087 in United States currency seized on or about October 15, 2010, from 4648 Northwest 114th Avenue, Doral, Florida 33178;

mm. approximately \$8,950 in United States currency seized on or about October 15, 2010, from 8798 Northwest 112th Street, Hialeah, Florida 33018;

nn. approximately \$6,480 in United States currency seized on or about October 15, 2010, from 939 Southwest 155 Court, Miami, Florida 33185;

oo. approximately \$3,098 in United States currency seized on or about October 15, 2010, from JOSE RAMON PEREZ in Brooklyn, New York; and

pp. approximately \$1,033 in United States currency seized on or about October 15, 2010, from ESTALIN JIMENEZ in Brooklyn, New York.

FORFEITURE ALLEGATION:

Count Five: JIMENEZ-PEREZ/DELGADO Cell Money Laundering Conspiracy

27. As a result of committing the offense of conspiracy to launder money as alleged in Count Five of this Indictment, WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," ESTALIN JIMENEZ, a/k/a "Stalin," RICHARD JIMENEZ-PEREZ, a/k/a "Milton

Delgado," a/k/a "Javier Ramirez-Santiago," JULIO CESAR LEONARDO RAMIREZ, and DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1)(A), all property, real and personal, involved in the offense and all property traceable to such property, including but not limited to at least \$5,000,000 in United States currency, in that such sum in aggregate represents the amount of property involved in the offense.

FORFEITURE ALLEGATION:

Count Seven: MATTHEW SANTIAGO's Possession Of A Firearm During And In Relation To A Drug Trafficking Crime

28. As the result of committing the firearms offense as alleged in Count Seven of this Indictment, MATTHEW SANTIAGO, a/k/a "Dirt," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), any and all firearms and ammunition involved in the offense.

Substitute Asset Provision

29. If any of the property described above as being subject to forfeiture in Paragraphs 26 through 28 above, as a result of any act or omission of the defendants:

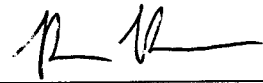
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956;  
Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

  
\_\_\_\_\_  
FOREPERSON

  
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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MANUEL GEOVANNY RODRIGUEZ-PEREZ, a/k/a "Manny," a/k/a "Shorty," a/k/a "Andres Garcia," JOSE BETANCOURT, KAREEM BURKE, a/k/a "Biggs," JENNY CASTILLO, MIGUEL CERDA, a/k/a "Manganzon," ROSEMARY DEJESUS, a/k/a "Rosy," WILLIAM ALCIBIO DELGADO, a/k/a "Mejor," EDGAR ENCARNACION-LAFONTAINE, a/k/a "Tapon," JAVIER FALCON, DANIEL FERNANDEZ, ALFONSO GARCIA, a/k/a "Fonse," a/k/a "Fonz," KLEVI GUTIERREZ, a/k/a "Black," EDWING ALBERTO HERRERA, a/k/a "Edwin Alberto Herrera," a/k/a "Shampoo," ISIDRO ESMELIN HERRERA, ESTALIN JIMENEZ, a/k/a "Stalin," RICARDO JIMENEZ-PADILLA, a/k/a "Gordo," RICHARD JIMENEZ-PEREZ, a/k/a "Milton Delgado," a/k/a "Javier Ramirez-Santiago," JULIO CESAR LEONARDO RAMIREZ, FRANCISCO LEONARDO, a/k/a "Chico," ANDY LOCIER, JIMMY LOPEZ, a/k/a "Chuck," LUIS ANTONIO LUCIANO, a/k/a "Louis Luciano," a/k/a "Lucky," MICHAEL MARTINEZ, a/k/a "Miguel Doleo," ROBERT MARTINEZ, ABEL MATOS, a/k/a "Viejo," NELSON AUGUSTO MATOS, IDAEL MENA-HERNANDEZ, a/k/a "Fidel," ARTURO MENA-SIFONTE, a/k/a "La Vieja," ERICK FULGENCIO NUNEZ, a/k/a "Mongolico," a/k/a "Eddie," FRANKLIN MANUEL PACHECO-VALDEZ, DEYANIRA PAULINO-GOMEZ, a/k/a "Maritza Alvarez-Cruz," ARIEL PENA, a/k/a "Bin," a/k/a "Vin," JOSE RAMON PEREZ, LEODIS PEREZ, a/k/a "Leodi," MIRIAM PIMENTEL, RICARDO PIMENTEL, a/k/a "Richardo Pimentel," a/k/a "Zook," a/k/a "Scarface," VICTOR QUEZADA, a/k/a "Jose Hiram Quintero-Callejas," a/k/a "Gordo," EMMANUEL RAMIREZ, a/k/a "Titi," LETICIA RAPOSO, a/k/a "La Rubia," MICHAEL ANGELO REYES, a/k/a "Kiki," EDWIN RIVERA, a/k/a "Papote," JOSE A. RODRIGUEZ, a/k/a "Viejo," OSCAR RODRIGUEZ, a/k/a "Chang," a/k/a "Chan," ANDRES ROJAS, a/k/a "Conejo," JESUS SANCHEZ, ADEL SANTANA-ZAMORA, a/k/a "Adel Santana," MATTHEW SANTIAGO, a/k/a "Dirt," MATTHEW WOODSTOCK STANG, a/k/a "Magazine Guy," JEROME SIMPSON, a/k/a "Suburban," DANIEL VALDEZ, OSMEL VAZQUEZ-PEREZ, a/k/a "Come Pizza," a/k/a "Omél," CHRISTOPHER VIZCAINO, a/k/a "Chuch," a/k/a "Pechucho," a/k/a "Pechuch,"

Defendants.

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SUPERSEDING  
INDICTMENT

S12 10 Cr. 905 (LTS)

(21 U.S.C. §§ 812, 841(a)(1), 841(b)(1)(A) &  
846; 18 U.S.C. § 1956; 18 U.S.C. § 3147; 18  
U.S.C. § 924(C); 21 U.S.C. § 841(b)(1)(D).)

PREET BHARARA  
United States Attorney.

A TRUE BILL

Foreperson.

11/9/10  
S12

*[Signature]*  
S12 M.G. Mancini